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THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

19 CHANNEL, INC., a New York corporation) Case No. C-09-1972 BZ
20 and LOUIS VUITTON MALLETIER,)
21 S.A., a foreign business entity,)

22 Plaintiffs,)

23 v.)

24 TONY BOSINI and DOES 1-10,)
25 individually and jointly, d/b/a)
REPLICAMASTER.COM,)
SHOPREPLICA.COM,)
BUYHIGHREPLICA.COM,)
EREPLICABAGS.COM,)
EXACTWATCHES.NET,)
REPLICAHOURS.COM,)
SWISSREPLICA.US,)
THEWATCHESPRICEINDEX.INFO,)
YOURREPLICAWATCH.COM, and)
REPLICAHAUSE.COM,)

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**STIPULATED CONSENT PERMANENT
INJUNCTION**

Defendants.)

WHEREAS, this action having been commenced by the Plaintiffs, Chanel, Inc. ("Chanel") and Louis Vuitton Malletier, S.A. ("Louis Vuitton") (collectively the "Plaintiffs") against the

1 Defendant Tony Bosini d/b/a Replicamaster.com, Shopreplica.com, Buyhighreplica.com,
 2 Ereplibags.com, Exactwatches.net, Replicahours.com, Swissreplica.US,
 3 Thewatchespriceindex.info, Yourreplicawatch.com and Replicahause.com (the “Defendant”),
 4 alleging *inter alia*, trademark counterfeiting and trademark infringement, and false designation of
 5 origin and a copy of the Summons, Complaint and First Amended Complaint having been served
 6 upon the Defendant:

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8 IT IS STIPULATED, ORDERED, ADJUDGED AND DECREED that:

9 1. This Court has jurisdiction of the subject matter of all counts of this action and over
 10 the named parties hereto.

11 2. Chanel is the owner of the following trademarks (the “Chanel Marks”) in connection
 12 with high quality handbags, wallets, watches, bracelets, earrings, and necklaces:

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| 14 | <u>Mark</u> | <u>Reg. No.</u> | <u>Reg. Date</u> |
|----|-------------------------------------------------------------------------------------|-----------------|--------------------|
| 15 | CHANEL | 0,626,035 | May 1, 1956 |
| 16 |  | 1,314,511 | January 15, 1985 |
| 17 | CHANEL | 1,347,677 | July 9, 1985 |
| 18 |  | 1,734,822 | November 24, 1992 |
| 19 | CHANEL | 1,733,051 | November 17, 1992 |
| 20 |  | 3,022,708 | December 6, 2005 |
| 21 |  | 3,025,934 | December 13, 2005 |
| 22 |  | 3,025,936 | December 13, 2005 |
| 23 | CHANEL | 0,955,074 | March 13, 1973 |
| 24 | CHANEL | 1,571,787 | December 19, 1989 |
| 25 | J12 | 2,559,772 | April 9, 2002 |
| 26 | CHANEL | 3,133,139 | August 22, 2006 |
| 27 |  | 1,501,898 | August 30, 1988 |
| 28 | CHANEL | 0,612,169 | September 13, 1955 |

1 CHANEL 0,902,190 November 10, 1970
 2 8. Louis Vuitton is the owner of the following trademarks (the "LV Marks") in
 3 connection with high quality handbags, wallets, watches, earrings, and necklaces:

| 4 | <u>Mark</u> | <u>Registration No.</u> | <u>Registration Date</u> |
|----|-------------------------------------------------------------------------------------|-------------------------|--------------------------|
| 5 |  | 0,286,345 | August 25, 1931 |
| 6 |  | 0,297,594 | September 20, 1932 |
| 7 | LOUIS VUITTON | 1,045,932 | August 10, 1976 |
| 8 |  | 1,519,828 | January 10, 1989 |
| 9 |  | 1,653,662 | August 13, 1991 |
| 10 |  | 1,655,564 | September 3, 1991 |
| 11 | LOUIS VUITTON | 1,990,760 | August 6, 1996 |
| 12 |  | 2,098,630 | September 23, 1997 |
| 13 |  | 2,177,828 | August 4, 1998 |
| 14 |  | 2,181,753 | August 18, 1998 |
| 15 |  | 2,263,903 | July 27, 1999 |
| 16 | VUITTON | 2,657,903 | December 10, 2002 |
| 17 |  | 2,773,107 | October 14, 2003 |
| 18 |  | 2,828,919 | April 6, 2004 |
| 19 |  | 3,107,072 | June 20, 2006 |
| 20 |  | 2,378,388 | August 22, 2000 |
| | LOUIS VUITTON PARIS | | |

21 9. The Defendant and his respective officers, agents, servants, successors in interest
 22 employees and attorneys, and all persons in active concert and participation with them are hereby
 23 permanently restrained and enjoined, pending termination of this action from:

24 A. manufacturing or causing to be manufactured, importing, advertising, or
 25 promoting, distributing, selling or offering to sell counterfeit and infringing
 26 goods bearing the Chanel Marks and/or the LV Marks and/or any other
 27 intellectual property owned by either Plaintiff and/or using the Chanel Marks

1 and/or LV Marks and/or names in any manner;

2 B. using the Chanel Marks and/or LV Marks and/or the Chanel and Louis

3 Vuitton names in connection with the sale of any goods;

4 C. using any logo, and/or layout which may be calculated to falsely advertise the

5 services or products of the Defendant as being sponsored by, authorized by,

6 endorsed by, or in any way associated with the either of the Plaintiffs;

7 D. falsely representing himself as being connected with the Plaintiffs, through

8 sponsorship or association,

9 E. engaging in any act which is likely to falsely cause members of the trade

10 and/or of the purchasing public to believe any goods or services of the

11 Defendant, is in any way endorsed by, approved by, and/or associated with

12 either of the Plaintiffs;

13 F. using any reproduction, counterfeit, copy, or colorable imitation of the

14 Chanel Marks and/or LV Marks and/or any trademark owned by either

15 Plaintiff in connection with the publicity, promotion, sale, or advertising of

16 any goods sold by the Defendant, including, without limitation, handbags,

17 wallets, watches, bracelets, earrings, and necklaces;

18 G. affixing, applying, annexing or using in connection with the sale of any goods,

19 a false description or representation, including words or other symbols tending

20 to falsely describe or represent the Defendant's goods as being those of the

21 Plaintiffs, or in any way endorsed by the Plaintiffs;

22 H. offering such goods in commerce; and from otherwise unfairly competing

23 with the Plaintiffs.

24 I. secreting, destroying, altering, removing, or otherwise dealing with the

25 unauthorized products or any books or records which contain any information

26 relating to the importing, manufacturing, producing, distributing, circulating,

27 selling, marketing, offering for sale, advertising, promoting, renting or

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1 displaying of all products which infringe the Chanel Marks and/or the LV
2 Marks and/or any trademark owned by either Plaintiff; and

3 J. effecting assignments or transfers, forming new entities or associations or
4 utilizing any other device for the purpose of circumventing or otherwise
5 avoiding the prohibitions set forth in subparagraphs (A) through (I).

6 SO STIPULATED:

7 **Plaintiffs:** Chanel, Inc. and Louis Vuitton Malletier, S.A.

8 By their Attorney: STEPHEN M. GAFFIGAN,
A PROFESSIONAL ASSOCIATION

9 By: /s
10 Stephen M. Gaffigan

11 Attorneys for Plaintiffs
Chanel, Inc. and Louis Vuitton Malletier, S.A.

12 **Defendants:** Tony Bosini d/b/a Replicamaster.com, Shopreplica.com, Buyhighreplica.com,
13 Ereplibags.com, Exactwatches.net, Replicahours.com, Swissreplica.US,
14 Thewatchespriceindex.info, Yourreplicawatch.com, and ReplicaHause.com

15 By his Attorney: LAW OFFICE OF AYAL ABRAMS

16
17 By: /s
18 Ayal Abrams
19 600 Page Street, #101
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21 Attorneys for Defendant
22 Tony Bosini

23 SO ORDERED this 22 day of March, 2010.

24 
25 UNITED STATES MAGISTRATE JUDGE

26 Copies furnished to:
27 All parties of record